

EXHIBIT 1

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

MARIBEL BAEZ, *et al.*,

Plaintiffs,

vs.

13-cv-8916 (LAP)

NEW YORK CITY HOUSING AUTHORITY,

Defendant.

STIPULATION AND ORDER OF SETTLEMENT FOR CLAIM OF ATTORNEYS' FEES

WHEREAS, the July 24, 2018 Modified Amended Stipulation and Order of Settlement in this matter (ECF 193-1), approved by the Court on November 29, 2018 (ECF 219), provides, at ¶ 33, that Plaintiffs may seek from Defendant New York City Housing Authority (NYCHA) reasonable attorneys' fees incurred in connection with this action; and

WHEREAS, Plaintiffs' counsel National Center for Law and Economic Justice (NCLEJ) and Defendant's counsel have engaged in negotiations regarding the payment of attorneys' fees to NCLEJ for compliance monitoring activities during the period of March 17, 2017 to date, and have reached agreement on payment of fees;

WHEREAS, all other counsel for Plaintiffs, including the Natural Resource Defense Council (NRDC), Quinn Emanuel Urquhart & Sullivan, LLP, and Proskauer Rose LLP have represented, and by their signatures below, agree that they will not be seeking attorneys' fees from NYCHA for any activities undertaken on behalf of Plaintiffs in this action for the period of March 17, 2017 to date; and

WHEREAS, this is not an agreement that NRDC is not entitled to seek fees under applicable law in this case post-dating the attorneys' fees agreement between NCLEJ and NYCHA.

IT IS NOW HEREBY STIPULATED AND ORDERED:

1. Defendant agrees to pay to Plaintiffs' counsel NCLEJ the sum of \$90,000.00 attorneys' fees for compliance monitoring activities in this matter for the period of March 17, 2017 to the date this Stipulation and Order of Settlement for Claim of Attorneys' Fees (Stipulation) is "so ordered" by the Court.

2. Plaintiffs' counsel NCLEJ agrees to accept the above-referenced sum in full and final satisfaction for all claims for attorneys' fees, costs, and disbursements incurred in this matter for the period of March 17, 2017 to the date this Stipulation is "so ordered" by the Court.

3. Payment of the forgoing amount shall be made to Plaintiffs' counsel NCLEJ within thirty (30) days from the date of this Stipulation being "so ordered" by the Court. No interest shall accrue, so long as payment is made to Plaintiffs' counsel NCLEJ within thirty (30) days of the date that this Stipulation is so ordered. Otherwise, interest shall accrue at a rate of 9% annually commencing thirty (30) days following an Order of the Court approving this Stipulation.

4. In the event that Defendant does not make payment to Plaintiffs' counsel NCLEJ within sixty (60) days following an Order of the Court approving this Stipulation, Plaintiffs' counsel NCLEJ may move the Court for enforcement of this Order, and Defendant may oppose.

5. This Stipulation contains all of the terms and conditions agreed on by the parties regarding the payment by Defendant of attorneys' fees, costs, and disbursements for work done


by Plaintiffs' counsel NCLEJ in this matter for the period of March 17, 2017 to the date this Stipulation is so ordered by the Court.

6. This Stipulation may be executed in counterparts, all of which taken together shall constitute one duplicate original Stipulation, and may be executed by facsimile or electronically transmitted signature, which will be considered originals for the purposes of this Stipulation.

Counsel for Plaintiffs by:

//s// Greg Bass
Greg Bass
Senior Attorney
National Center for Law and Economic Justice
50 Broadway, Suite 1500
New York, NY 10004
Tel. (212) 633-6967
bass@nclej.org

DATED: February 22, 2023


Vivian H.W. Wang
Attorney
NATURAL RESOURCES DEFENSE COUNCIL
40 W. 20th Street
New York, NY 10011
Tel: 212- 727-4477
ywang@nrdc.org

DATED: February 22, 2023



Marc Greenwald

Partner

Quinn Emanuel Urquhart & Sullivan, LLP

51 Madison Avenue, 22nd Floor

New York, NY 10010

(o) +1-212-849-7140 (m) +1-646-345-2122

marcgreenwald@quinnemanuel.com

DATED: February 23, 2023



Julia D. Alonzo

Senior Counsel

Proskauer Rose LLP

Eleven Times Square

New York, NY 10036-8299

d 212.969.4558

f 212.969.2900

jalonzo@proskauer.com

DATED: February 24, 2023

Counsel for Defendant by:



Miriam Skolnik

Herzfeld & Rubin, P.C.

125 Broad Street

New York, NY 10004

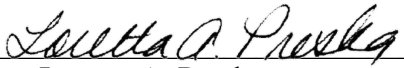
D: (212) 471-8457

O: (212) 471-8500

MSkolnik@herzfeld-rubin.com

DATED: February 24, 2023

IT IS SO ORDERED:



Hon. Loretta A. Preska
United States District Judge
Southern District of New York

DATED: 2/28/2023